

MICHAEL A. CARDOZO  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

Nec Ramon Ilano  
Phone: 212-788-8886  
Fax: 212-788-0367  
nilano@law.nyc.gov  
WTC/Toxic Tort Unit

August 9, 2011

**VIA FACSIMILE**

The Hon. Richard J. Holwell, U.S.D.J.

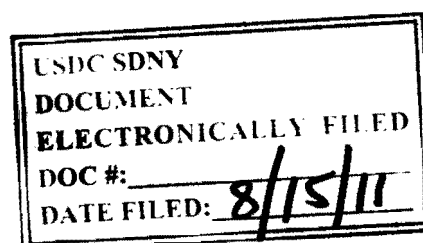
Re:

*Barley v. City of New York et al.*, 11 CIV 1300 (RJH)  
*Raia v. City of New York et al.*, 11 CIV 1301 (RJH)  
*Nee v. City of New York et al.*, 11 CIV 2149 (RJH)  
*Paccione v. City of New York et al.*, 11 CIV 2150 (RJH)  
*Aquino v. City of New York et al.*, 11 CIV 2697 (RJH)  
*John v. City of New York et al.*, 11 CV 4780 (RJH)  
*Caride v. City of New York et al* 11 CV 5043 (RJH)

Your Honor:

We represent the Defendants in the above-referenced cases, all of which involve claims by former New York City Department of Correction employees of exposure to toxic substances during the course of their employment at Rikers Island.

As per my conversation with your court clerk, we are submitting this letter to advise the Court that Plaintiff's counsel has filed two further complaints in regards to the above referenced matter. **John V. City of New York 11 CV 4780** and **Caride v. City of New York 11 CV 5043**. Both of these cases are related matters to the pending cases before the court. We have filed our answers to these complaints and indicated they are related matters. As per the instructions of his Honor at the 5/25/11 Court conference in possible anticipation of further complaints filed while the motion to dismiss was pending, we are advising this court of these additional cases, and confirming, that as per his Honor's instructions, that these related matters will be consolidated into **Barley v. City of New York 11 CV 1300**, for the pending motion to dismiss.



We thank Your Honor for your attention to this matter.

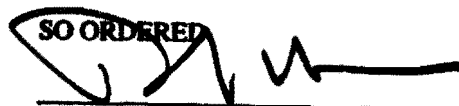
Very Truly Yours,



Noc Ramon Ilano Esq. (NI6225)

Cc: Chris Donadio - Burns & Harris

For the same reasons stated in  
the Court's June 2, 2011 Order  
in *Barley v. City of New York*  
[11 cv 1300, Dkt. No. 10], 11 Civ. 4780  
and 11 cv 5043 shall be consolidated  
under the docket number of the  
lead case *Barley v. City of New York*,  
11 Civ. 1300.

SO ORDERED  
  
RICHARD J. HOLWELL  
UNITED STATES DISTRICT JUDGE  
8/11/11